SOUTHERN DISTRICT OF NEW YORK	- V	
TERRE BEACH, et al., individually and on behalf of themselves and all others similarly situated,	: :	
Plaintiffs,	: (Case No. 17-CV-00563-JMF
V.	: :	
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, JPMORGAN CHASE & COMPANY, et al.,	: : : : : : : : : : : : : : : : : : : :	
Defendants.	: :	
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NOTICE OF DEFENDANTS' MOTION TO DISMISS THE CONSOLIDATED AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the Consolidated Amended Complaint, dated May 5, 2017; the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Consolidated Amended Complaint; the attached Declaration of Susan L.

Saltzstein, dated June 15, 2017, and exhibits thereto; and upon all prior papers and proceedings had herein, Defendants JPMorgan Chase Bank, National Association, JPMorgan Chase & Company, Compensation & Management Development Committee of the Board of Directors for JPMorgan Chase & Company, the Selection Committee, the Employee Plans Investment Committee, J.P. Morgan Investment Management Inc., Head of Human Resources for JPMorgan Chase & Co., Chief Financial Officer for JPMorgan Chase & Co., Benefits Director of JPMorgan Chase & Co., Stephen B. Burke, Lee R. Raymond, William C. Weldon, John C. Donnelly, Marianne Lake, Bernadette J. Branosky, Thelma Ferguson, and John Does 1-20 will move this Court, before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time designated by the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6) and the

Employee Retirement Income Security Act of 1974, as amended, 29 U.S.C. §§ 1101 *et seq.*, for an Order (a) dismissing the Complaint with prejudice; and (b) granting such other and further relief as this Court may deem just and proper.

Dated: June 15, 2017 New York, New York

/s/ Susan L. Saltzstein

Susan L. Saltzstein
James R. Carroll (pro hac vice pending)
Michael S. Hines (pro hac vice pending)
SKADDEN, ARPS, SLATE
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
(212) 735-3000
susan.saltzstein@skadden.com
james.carroll@skadden.com
michael.hines@skadden.com

Counsel for Defendants
JPMorgan Chase Bank, National Association,
JPMorgan Chase & Company, Compensation &
Management Development Committee of the Board
of Directors for JPMorgan Chase & Company, the
Selection Committee, the Employee Plans
Investment Committee, J.P. Morgan Investment
Management Inc., Head of Human Resources for
JPMorgan Chase & Co., Chief Financial Officer for
JPMorgan Chase & Co., Benefits Director of
JPMorgan Chase & Co., Stephen B. Burke, Lee R.
Raymond, William C. Weldon, John C. Donnelly,
Marianne Lake, Bernadette J. Branosky, Thelma
Ferguson, and John Does 1-20